

October 5, 2004

Mr. Jim Marxen
Chief of Public Participation
Department of Toxic Substances Control
EnvJust@calepa.ca.gov

Re: SF Power's Comments on California Environmental Protection Agency (Cal-EPA) *Environmental Justice (EJ) Action Plan*

Dear Mr. Marxen:

San Francisco Community Power, www.sfpower.org, helps families and small businesses located in Southeast San Francisco reduce their electricity use and associated utility costs, thereby lowering dependence on locally polluting power plants. SF Power has trained and employed almost two-dozen low income individuals in the energy efficiency field; and, by reducing their energy costs, has helped small and medium businesses located in "EJ communities" improve their profitability.

SF Power believes that low income, environmentally beset communities should be first, rather than last, in line to receive new, more sustainable energy technologies. Likewise, we believe that people – including low income households -- should take responsibility for their own actions that contribute to environmental degradation. To that end we are currently leading a California Public Utility Commission-sponsored pilot to determine whether low income families would change the timing of their electricity use if by so doing they would reduce the need for the polluting Hunters Point and Potrero Power Plants. Preliminary results from this study indicate that environmental education can effectively induce energy conservation, and lead to a willingness to shift electricity demand to "off-peak" periods.

SF Power recommends that as part of its *EJ Action Plan* Cal-EPA consider adding a pilot study to determine whether low income communities could effectively identify and implement dispersed measures to reduce polluting air emissions and/or reduce water consumption.¹ Such a pilot would effectively address the *Action Plan's* goals, and, if successful, could be widely replicated throughout the state.

SF Power would welcome the opportunity to collaborate on any of Cal-EPA's pilots. Certainly the community in which we work is plagued by the full range of air, water, and land-related pollutants.

Sincerely,

Steven Moss

¹ See Steven J. Moss, "Community-Based Trading Mechanisms to Reduce Polluting Air Emissions and Address Global Warming," *Journal of Environmental Assessment, Policy, and Management*, June 1999.